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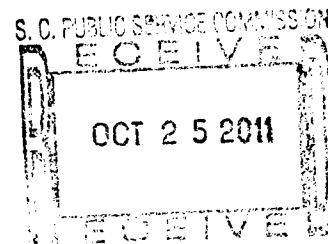


Monahan & Moses, LLC

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October 24, 2011



VIA US MAIL

The Honorable Jocelyn Boyd
Chief Clerk/Administrative
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Saluda Building
Columbia, SC 29211

Re: IN RE: DOCKET NO.: 2011-271-E – *Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase Its Electric Rates and Charges*

Dear Ms. Boyd:

Enclosed pursuant to SCCR 103-833 governing discovery, please find a copy of the First Set of Discovery Requests of Wal-Mart Stores East, LP to Duke Energy Carolinas, LLC.

Sincerely,

Timothy J. Monahan
MONAHAN & MOSES, LLC
Counsel for Wal-Mart Stores East, LP and Sam's East, Inc.

cc: Service List

www.momolaw.com

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-271-E**

In the Matter of:

Application of Duke Energy Carolinas, LLC
for Authority to Adjust and Increase
Its Electric Rates and Charges

)
)
) **FIRST SET OF**
) **DISCOVERY**
) **REQUESTS OF**
) **WAL-MART STORES**
) **EAST, LP AND SAM'S EAST,**
) **INC. TO DUKE**
) **ENERGY CAROLINAS, LLC**
)
)

Pursuant to SCCR 103-833, Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart") requests that Duke Energy Carolinas, LLC ("Duke") answer the interrogatories and produce the documents as indicated below within twenty (20) calendar days of receipt of this request for production and all other discovery requests to which the following request applies.

The Company is requested to provide one copy of all responses to this request to
to:

Steve Chriss
Wal-Mart Stores East, LP
2001 SE 10th St.
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and

Holly Rachel Smith, Esq.
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Also, with respect to all calculation provided in response to a discovery request, please provide the electronic format with all formulae and links intact.

A copy of this request has been sent to the Chief Clerk of the Public Service Commission of South Carolina.

First Set of Discovery Requests

REQUEST 1-1:

Please provide a copy of all discovery responses, including all attachments, which you have served or hereafter serve on other parties to this docket, in the same form in which you served such responses.

REQUEST 1-2:

Please provide electronic copies, in Microsoft Excel format with all formulae and links intact, of all workpapers and exhibits.

Dated this 24th day of October, 2011.

Respectfully submitted,



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Attorneys for WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **Walmart's First Set of Discovery Requests to Duke** in Docket No. 2011-271-E has been served on this 24th day of October, 2011 by electronic mail (e-mail), hand delivery or by depositing a copy in the United States mail, postage prepaid, addressed to the parties of record as follows:

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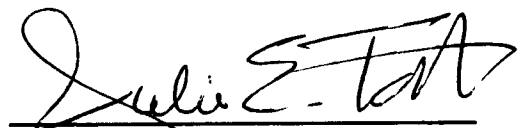
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